

Zalman Kass

From: Zalman Kass
Sent: Monday, June 3, 2019 12:27 PM
To: Velvel (Devin) Freedman
Cc: Kyle Roche; Amanda McGovern; Zaharah Markoe; Bryan Paschal; Nathalie Bermond
Subject: Tulip Trust Document Production

Vel,

In furtherance of our meet and confer conference on Thursday, May 30, 2019, the purpose of this communication is to confirm our review and production of all non-privileged documents in our database that contain the term “Tulip” or “Seychelles.” On Friday, May 31, 2019, our vendors sent you two links containing a total of 1,648 documents responsive to the word “Tulip.” We expect to send you the remaining documents by this Wednesday.

The initial production of the documents containing the term “Seychelles” is scheduled to go out today, with the remainder going out on Wednesday.

To be clear, these productions include all non-privileged documents containing the words “tulip” or “Seychelles” that relate to the trusts or bitcoin.

Best,

Zalman

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